

Oct-10-06 12:45pm From-LAW OFFICES

6702335262

T-186 P.02/04 F-118

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8 Attorney for Defendant Robert A. Bisom

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN MARIANA ISLANDS

11 ROBERT D. BRADSHAW,

CASE NO. CV 05-00027

12 Plaintiff,

13 vs.

14 COMMONWEALTH OF THE NORTHERN
15 MARIANA ISLANDS, *et al.*,

16 Defendants.

17 SECOND STIPULATION TO
18 REQUEST ADDITIONAL TIME
19 TO FILE RESPONSIVE
20 PLEADING TO THIRD
21 AMENDED COMPLAINT

22 COMES NOW Defendant Robert A. Bisom, through his attorney of record, and
23 Plaintiff Robert D. Bradshaw, *pro se*, who HEREBY STIPULATE, pursuant to Fed. R. Civ. P.
24 6(b) and L.R. 7.1.h.1, to an additional two-week extension of time for Defendant Bisom to file
25 a pleading responsive to Plaintiff's Third Amended Complaint, and respectfully request that
26 the Court extend such time for Defendant Bisom's response to Friday, November 3, 2006. A
27 proposed order is submitted herewith. If the Court grants this Stipulated Request, the total
28 time extension beyond the ten day response time provided by Fed. R. Civ. P. 15(a) would be
four weeks.

This is the second stipulation for an extension of time for Mr. Bisom to file a responsive
pleading. On October 3, 2006, based on a stipulation by the parties, the Court extended by
two weeks the time for Mr. Bisom's response, originally due within ten days of the filing of the
Third Amended Complaint. The first extension was through October 20, 2006. Additional
extensions are provided for in Fed. R. Civ. P. 6(b) where the request for additional time is
submitted prior to the expiration of the first extension and for cause shown.

Oct-19-06 12:46pm From-LAW OFFICES

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1 Further, the undersigned counsel for Mr. Bisom declares that the following reasons
2 necessitate this second extension of time:

3 Given the length and breadth of Plaintiff's Third Amended Complaint, the numerous
4 prior rulings by the Court with regard to Plaintiff's pleadings, the extent of the related,
5 ongoing action(s) in the Commonwealth courts, the lengthy period of time to which Plaintiff's
6 allegations relate, the need to address several of Plaintiff's claims at this stage of the litigation,
7 and the undersigned's admitted underestimation of the time it will take to prepare a filing in
8 response to the Third Amended Complaint, an additional, two-week extension of time is fair
9 and reasonable. Despite all due diligence, the undersigned is unable to file a complete
10 responsive pleading on or before the date first extended. The extension of this time to
11 respond to the Third Amended Complaint will have no effect on any scheduled deadlines
12 because, with the exception of the other defendants' deadline to file responsive pleadings,
13 there are no other scheduled deadlines.

14 Plaintiff Bradshaw concurs in the additional extension as indicated by his participation
15 in this Stipulation.

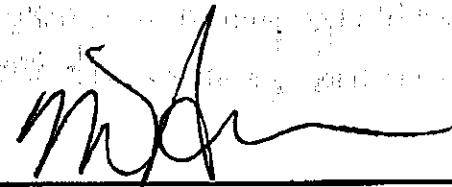
17 SO STIPULATED:

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21 ROBERT D. BRADSHAW

22 DATE: 10/19/06

23
24 Pro se

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21 MARK B. HANSON

22 DATE: 10/19/2006

23 Attorney for Defendant Robert A. Bisom
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